

1 JOHN J. SHAEFFER (SBN 138331)  
jshaeffer@FoxRothschild.com  
2 FOX ROTHSCHILD LLP  
Constellation Place  
3 10250 Constellation Blvd, Suite 900  
Los Angeles, CA 90067  
4 Telephone: 310.598.4150  
Facsimile: 310.556.9828

5  
6 MICHAEL K. TWERSKY (*pro hac vice*)  
mtwersky@foxrothschild.com  
7 BETH L. WEISSER (*pro hac vice*)  
bweisser@foxrothschild.com  
8 ERIKA PAGE (*pro hac vice*)  
epage@foxrothschild.com  
9 ALBERTO M. LONGO (*pro hac vice*)  
alongo@foxrothschild.com  
10 FOX ROTHSCHILD, LLP  
980 Jolly Road, Suite 110  
Blue Bell, PA 19422  
11 Telephone: 610.397.6500  
Facsimile: 610.397.0450

12 Attorneys for Plaintiffs  
13 Sunil Kumar, Ph.D. and Praveen Sinha, Ph.D.

14 **IN THE UNITED STATES DISTRICT COURT**  
15 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

16 SUNIL KUMAR, Ph. D  
PRAVEEN SINHA, Ph. D.,

17 Plaintiffs,

18 v.

19 DR. JOLENE KOESTER, in her official  
20 capacity as Chancellor of California State  
University,

21 Defendant.

Case No. 2:22-CV-07550-RGK-MAA

**DECLARATION OF MICHAEL K.  
TWERSKY IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO  
DEFENDANT'S COMBINED TRIAL  
BRIEF AND MOTION FOR  
SUMMARY JUDGMENT OR  
PARTIAL SUMMARY JUDGMENT**

Judge: R. Gary Klausner  
Trial: October 24, 2023  
(on the briefs)

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28 **DECLARATION OF MICHAEL K. TWERSKY IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO DEFENDANT'S COMBINED TRIAL  
BRIEF AND MOTION FOR SUMMARY JUDGMENT  
OR PARTIAL SUMMARY JUDGMENT**

**DECLARATION OF MICHAEL K. TWERSKY<sup>1</sup>**

I, Michael K. Twersky, do hereby state and declare as follows:

1. I am an attorney at law duly licensed to practice law in the Commonwealth of Pennsylvania and State of New Jersey. I am a partner at the law firm of Fox Rothschild LLP and am admitted *pro hac vice* in this proceeding. I submit this declaration in support of Plaintiffs' Opposition to Defendant's Combined Trial Brief and Motion for Summary Judgment or Partial Summary Judgment. I have personal knowledge of the matters contained in this declaration and, if called and sworn as a witness, I could and would competently testify to all the matters contained herein.

2. Attached hereto as **Exhibit A** is a true and correct copy of selected pages from the deposition of Laura Anson ("Anson Tr."), Defendant's designee, conducted on August 4, 2023 for use in this action.

3. Attached as **Exhibit B** is a true and correct copy of selected pages from the deposition of Professor Camille Gear Rich ("Rich Tr."), Defendant's expert, conducted on September 20, 2023 for use in this action.

4. Attached as **Exhibit C** is a true and correct copy of selected pages from the deposition of Professor Frank S. Ravitch ("Ravitch Tr."), Defendant's expert, conducted on September 21, 2023 for use in this action.

5. Attached as **Exhibit D** is a true and correct copy of selected pages from the deposition of Professor Ajantha Subramanian ("Subramanian Tr."), Defendant's expert, conducted on September 20, 2023 for use in this action.

6. Attached as **Exhibit E** is a true and correct copy of an email dated July 26, 2021 sent by then Interim Executive Vice Chancellor, Fred Wood, which was produced by Defendant in this case bearing Bates label CSU001215.

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<sup>1</sup> This Declaration and annexed Exhibits are filed in support of Plaintiffs' Opposition to Defendant's Combined Trial Brief and Motion for Summary Judgment or Partial Summary Judgment and the Joint Statement of Undisputed and Disputed Facts.

